

October 15, 2002

Teresa Borczik  
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St. Paul, MN 55144

Dear Ms. Borczik

EPA has reviewed the test plan submitted by 3M for the class of perfluorinated compounds (PFCs) covered by a single CAS Registry Number [86508-42-1] and specific chemical name determined by EPA upon its submission under the TSCA Section 5 New Chemicals Program to be, "Perfluoro-compounds, C<sub>5</sub>-C<sub>18</sub>" with the corresponding definition

"An inert fluid composed of a complex combination of organic compounds resulting from the distillation of electrochemically fluorinated organic compounds. It consists of branched, linear, and cyclic perfluorinated hydrocarbons having carbon numbers predominantly in the range of C<sub>5</sub>-C<sub>18</sub> and boiling in the range of approximately 25° C to 255° C (77° F to 491° F). Perfluorinated amine and ether compounds may also be present."

According to EPA's review of the test plan, it appears that the submitter represented for the purposes of the HPV Challenge Program the fractionated material covered under [86508-42-1] and corresponding to different boiling ranges to predominantly consist of separate products with different specific compositions. Only the individual distillation fraction containing [311-89-7] meets the criteria for HPV chemicals based upon production volumes reported on the 1990 Inventory Use Reports (IUR) and in the HPV support documents.

As submitted, the data for [86508-42-1] inadequately represent all possible fractionated products. For the purpose of meeting the HPV Challenge Program, EPA would need information to adequately cover 3 subcategories of chemicals: perfluorinated hydrocarbons, perfluorinated ethers, and perfluorinated tertiary amines. Of the products identified in the submitted test plan, there is no single distillation fraction of [86508-42-1] that adequately represents all individual distillation streams because of structure variations and possible health and environmental concerns. Since the only distillation fraction of [86508-42-1] that meets the HPV criteria is the cut consisting of perfluorotributyl amine as its major component, 3M may wish to change their submission to cover the single HPV chemical [311-89-7]. This acceptable approach would limit the amount of health and environmental information requirements while adequately representing what is actually commercially manufactured. However, if 3M wishes to include the additional subcategory members as separate products, EPA would welcome any data for the perfluorinated hydrocarbons or perfluorinated ethers.

Recent health and environmental data submitted to EPA for other perfluoro compounds have prompted closer scrutiny for many perfluorinated chemicals. The persistence of these compounds in all media also raises a concern for adequately covering the toxicity endpoints.

I encourage 3M to take the necessary steps to inform EPA of how they will pursue this category. EPA is prepared to evaluate the data for these compounds as soon as 3M supplies a response or resubmits a revised test plan.

If you have any questions about this response, please contact Richard Heftner, Chief of the HPV Chemicals Branch, at 202-564-7649. Submit questions about the HPV Challenge Program through the HPV Challenge Program Web site "Submit Technical Questions" button or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached by e-mail at [tsca-hotline@epa.gov](mailto:tsca-hotline@epa.gov).

Sincerely,

-S-

Oscar Hernandez, Director  
Risk Assessment Division

cc: C. Auer  
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